

AO 93 (Rev. 5/85) Search Warrant

United States District Court

DISTRICT OF DELAWARE

In the Matter of the Search of

(Name, address or brief description of person or property to be searched)

[REDACTED]
Newark, Delaware,
described more particularly on
Attachment A

SEARCH WARRANT

CASE NUMBER: 03-145M-MPT

REDACTED

TO: Postal Inspector Keith Salter and any Authorized Officer of the United States

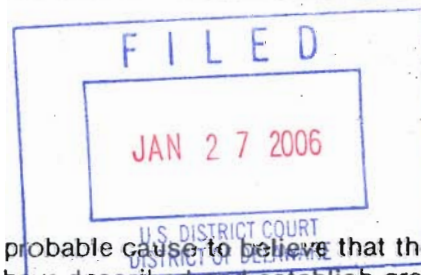
Affidavit(s) having been made before me by Postal Inspector Keith Salter who has reason to
Affiant

believe that ☐ on the person of or ☒ on the premises known as (name, description and/or location)

[REDACTED] Newark, Delaware, described more particularly on
Attachment A

in the _____ District of Delaware there is now
concealed a certain person or property, namely (describe the person or property)

described more particularly on Attachment B



I am satisfied that the affidavit(s) and any recorded testimony establish probable cause to believe that the person or property so described is now concealed on the person or premises above described and establish grounds for the issuance of this warrant.

YOU ARE HEREBY COMMANDED to search on or before _____
Date

(not to exceed 10 days) the person or place named above for the person or property specified, serving this warrant and making the search (in the daytime — 6:00 A.M. to 10:00 P.M.) (at any time in the day or night as I find reasonable cause has been established) and if the person or property be found there to seize same, leaving a copy of this warrant and receipt for the person or property taken, and prepare a written inventory of the person or property seized and promptly return this warrant to _____

as required by law. You are further authorized and ordered to _____ U.S. Judge or Magistrate
comply with the conditions set forth in Schedule C.

_____ at Wilmington, Delaware
Date and Time Issued City and State

Honorable Mary Pat Thyng
United States Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

ATTACHMENT A

The subject premises is part of a strip mall located on the southern side of the [REDACTED]
[REDACTED] Newark, Delaware 19711. The subject premises is located on the eastern
end of the complex between a dry cleaner and a financial institution. The name [REDACTED] is
clearly visible on the front of the premises.

ATTACHMENT B

One Express Mail tyvek envelope addressed to Donald Cohen, c/o [REDACTED]
Newark, DE 19711, with a return address of YBC, P.O. Box 176, Clear Spring, MD
21722, with an affixed \$13.65 postage stamp.

One VHS videotape titled, "Sports Exam", with the initials KS carved into the plastic case of the
videotape under the front flap

All video cassette tapes, photographs, negatives, drawings, magazines, or other visual media or
literature depicting or describing minors engaged in sexually explicit conduct.
(Authorization is granted for the viewing and review of these videotapes at a time
subsequent to the date of the search).

Any and all correspondence, materials, diaries, notes and any other records, including opened
and unopened e-mail or instant messages, relating to the ordering, receipt, acquisition,
trade, storage, possession, or sale of material depicting minors engaged in sexually
explicit conduct, including but not limited to correspondence to and from YBC Vids,
P.O. Box 176, Clear Spring, MD 21722.

Any and all books, ledgers, and other records bearing on the production, reproduction, receipt,
shipment, or on orders, requests, purchases or transactions of any kind involving the
transmission through interstate or foreign commerce including the U.S. Mail or by
computer, any visual depiction of minors engaged in sexually explicit conduct.

Records indicating occupancy or ownership of the premises described above, such as utility bills,
mail envelopes, or addressed correspondence.

The following may be seized and searched for the items set forth in the three preceding
paragraphs above, or seized for use in the search of the items listed below. Agents may
transport these items for searching to a site other than where seized:

1. All computers, computer hardware, computer software and computer documentation,
including but not limited to tapes, cassettes, cartridges, commercial software and
manuals, hardware, computer disks, CD-ROMS, disk drives, monitors, printers,
scanners, modems, tape drives and other computer related equipment.
2. Any devices capable of storing information and/or data in the form of magnetic or
electronic coding on computer media or on media capable of being read by a
computer or with the aid of computer-related equipment. This media includes floppy
diskettes, fixed hard disks, removable hard disk cartridges, tapes, laser disks, video
cassettes and other media which is capable of storing magnetic coding, as well as
punch cards, and/or paper tapes, and all printouts of stored data.
3. Any and all electronic devices which are capable of analyzing, creating, displaying,
converting or transmitting electronic or magnetic computer peripherals, word

processing equipment, modems, monitors, cables, printers, plotters, encryption circuit boards, optical scanners, external hard drivers, external tape backup drives and other computer-related electronic devices.

4. Any and all instructions or programs stored in the form of electronic or magnetic media, which are capable of being interpreted by a computer, or related components. The items to be seized include operating systems, application software, utility programs, compilers, interpreters and other programs or software used to communicate with computer hardware or peripherals either directly or indirectly via telephone lines, radio or other means of transmission.
5. Any and all written or printed material which provides instructions or examples concerning the operation of the computer systems, computer software and/or any related device, and sign-on passwords, encryption codes or keys or other information needed to access the computer system and/or software programs.

All of which is (i) property that constitutes evidence of the commission of criminal offenses, (ii) contraband, the fruits of crime, or things criminally possessed, and/or (iii) property designed or intended for use or which is or has been used as the means of committing criminal offenses, that is, violations of Title 18, United States Code, Sections 2252 and 2252A.

SCHEDULE C

1. The Court having found probable cause to exist that upon delivery of the Express Mail envelope and video tape, both described in paragraph 13 of the Affidavit, to the subject premises that the items will be accepted and taken inside the subject premises, the Court conditions the execution of this search warrant on the prior actual occurrence of those events.
2. With respect to any computer hardware, computer software and computer storage media, authorization is hereby granted for the Postal Inspection Service, and other law enforcement officers under this direction and control, to remove all such items from the premises in order for them to be processed at a later date off the premises by a qualified computer specialist in a laboratory or other competent setting to accurately and completely retrieve data maintained on the seized items and described in Schedule B.
3. With respect to any videotapes and films, authorization is similarly granted for their seizure from the premises for an off the premises viewing to determine if the materials contain subject matter which is listed in Schedule B.